Exhibit 41 - Statement A

NATURE OF THE PROPOSAL

prepared for

Superstation, Inc.

WTBS-DT Atlanta, Georgia

Facility ID 64033

Ch. 20 1000 kW 310 m

Superstation, Inc. ("*Superstation*") is the licensee of station WTBS(TV), NTSC Channel 17, Atlanta, Georgia (BLCT-2402) and the paired WTBS-DT, DTV Channel 20 (BLCDT-20020918AAR). *Superstation* proposes herein to increase the effective radiated power ("ERP") of WTBS-DT from the authorized 450 kW to 1000 kW. No other changes are proposed.

Nature of Proposal

WTBS-DT is licensed to operated from a common multi-user antenna system mounted atop an existing tower approved by the FAA and registered with the FCC, Antenna Structure Registration number 1223132.

The proposed transmitting antenna will be the currently authorized Dielectric, model number TUD-05-14/70U-2-B, which is non-directional in the horizontal plane; 0.75 degrees of electrical beam tilt will continue to be employed. The effective radiated power will increase from the currently authorized 450 kilowatts to 1000 kilowatts, horizontally polarized. To accomplish the power increase, *Superstation* will increase the output power from the existing WTBS-DT transmitter. Thus, no tower construction or antenna installation work is required to accomplish the power increase for WTBS-DT.

The attached **Exhibit 41 - Figure 1** is a map which depicts the coverage contours for the proposed WTBS-DT facility. Per the Commission's requirements, the DTV service contour (41 dBµ) of the facility will completely encompass the principal community. **Exhibit 41 - Figure 1** also demonstrates that the enhanced principal community coverage requirement of 48 dBµ (required by December 31, 2004 for commercial stations) will also be met by the proposed facility.

Allocation Considerations

WTBS-DT is licensed to operate at 450 kilowatts ERP at 310.3 meters antenna height above average terrain ("HAAT") and would increase ERP to 1000 kW under the instant proposal. This operation is in excess of the reference DTV facilities of 82.5 kilowatts ERP at 332 meters HAAT. Further, the authorized WTBS-DT operation is located at a transmitter site that is not within 5 km of the reference facility. Accordingly, a detailed interference study was conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission's Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, July 2, 1997 ("OET-69")[1]. The interference study examined the change in interference as experienced by other stations that would result from the proposed facility.

All stations considered in this study are listed in **Exhibit 41 - Table I**. The results of the interference study, also summarized in **Exhibit 41 - Table I**, indicate that any additional interference to these stations meets the Commission's 2% / 10% interference limits, except for one instance. Specifically, the *de minimis* limit is exceeded with respect to the WCOV-TV, NTSC Channel 20, Montgomery, AL, construction permit, BPCT-19960726KH. An application for license to cover construction of this facility has not been filed, and the construction permit expired on November 5, 2002. The record for this expired construction permit has yet to be archived in the Commission's engineering database. Additionally, a review of the FCC's on-line and paper files for WCOV-TV did not reveal any filing or tolling activity related to extending the construction permit expiration date. Therefore, it is respectfully requested that Commission staff in processing the instant application not consider the WCOV-TV construction permit since protection of that facility should no longer be required.

[1]The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A cell size of 2 km was employed. Comparisons of various results of this computer program (run on a Sun processor) to the Commission's implementation of OET-69 show excellent correlation.

The licensed WTBS-DT facility employs a combiner and filter system for the common antenna at the multi-user Richland site. This combiner and filter system will continue to be employed for the facility proposed herein. While problems related to the proximity of other nearby facilities is not expected, *Superstation* understands its responsibility to remedy any problems resulting from its continued co-location at the Richland Tower site. Should any problems arise, such mitigating measures as additional filters or traps may be employed.

Class A Station Protection

With respect to low power television stations that have been granted a Class A License or hold a Class A Construction Permit, the instant proposal does not involve prohibited contour overlap (as defined under §73.623(c)(5) of the Commission's Rules) to any Class A station, except for that of the authorized WDTA-LP (CP-Mod; BMPTTL-20010711ACX, Ch. 28, Atlanta, GA) 5.9 km distant.

Pursuant to §73.623(c)(5)(iii) of the Commission's Rules, a request for waiver of the standard contour protection requirements of §73.623(c)(5)(i) may be based on a more detailed analysis to show that interference is not likely. Specifically, interference protection to a Class A station from a DTV proposal may also be demonstrated using OET-69 methods. Accordingly, detailed interference studies were conducted in accordance with OET-69 to determine the impact of the proposed WTBS-DT facility on WDTA-LP.

The results of the interference study regarding Class A eligible stations is summarized in **Exhibit 41 - Table II**. As shown therein, there is no additional interference caused to WDTA-LP. However, if a waiver of §73.623(c)(5)(i) is necessary, then one is respectfully requested on behalf of the applicant for the reasons stated above.

Other Site Considerations

The proposed site is located 36.1 km from the FCC's Powder Springs, Georgia, monitoring station. Using the Commission's standard propagation curves, it is predicted that the facility proposed herein will produce a field strength of 86.25 dBµ (20.5 mV/m) over the Powder Springs monitoring station. This level exceeds the 10 mV/m guideline established in §73.1030(c)(1) regarding Commission monitoring stations. However, based on prior informal consultations with Commission Staff, the 10 mV/m signal level reference in §73.1030(c)(1) was developed primarily for AM broadcast frequencies (540 - 1710 kHz). Higher signal levels for UHF television stations are acceptable. Commission Staff has, in the past, advised that their threshold for objection (at the lower edge of the Channel 20 frequency band) is a signal level of approximately 64.65 mV/m (96.2 dBµ). Thus, 20.5 mV/m signal level attributable to the proposed WTBS-DT facility is not expected to be objectionable to Commission Staff.

The are no non-directional AM facilities within 0.8 km of the proposed site. The WQXI(AM), Atlanta, Georgia nighttime directional antenna array (BL-19970822KA) is located 1.4 km from the proposed site. The FCC's engineering database also indicates the existence of a record for a construction permit application for a directional antenna facility for WGKA(AM), Atlanta, Georgia, 1.36 km distant, see BMP-19991217ACE. The WGKA application was dismissed by the Commission and no longer warrants consideration. The WTBS-DT facility proposed herein will employ an existing, installed antenna and transmission line system. Thus, no new tower construction or antenna installation work is required. Only an increase in transmitter power is necessary to implement the instant proposal and no impact to WQXI will result. Therefore, based on the foregoing, it is respectfully requested that a construction permit for the proposed WTBS-DT facility not be conditioned on taking proof-of-performance measurements on the WQXI nighttime directional antenna array. If a waiver of Section 73.1692 of the FCC Rules is required, then one is respectfully requested on behalf of the applicant.

Based on the foregoing, it is believed that the proposed WTBS-DT facility complies with the pertinent FCC's Rules and Regulations.

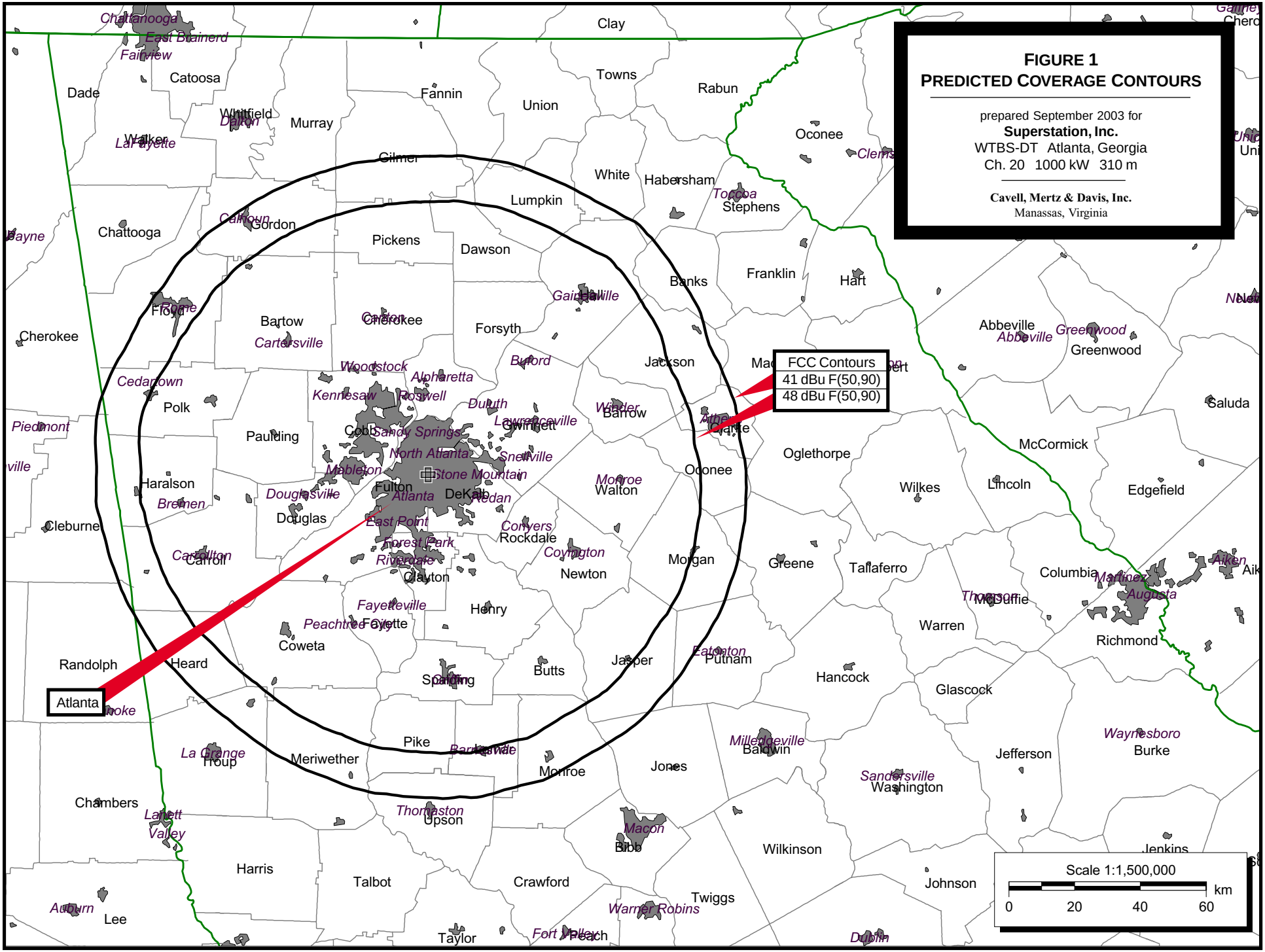
FIGURE 1
PREDICTED COVERAGE CONTOURS
prepared September 2003 for
Superstation, Inc.
WTBS-DT Atlanta, Georgia
Ch. 20 1000 kW 310 m
Cavell, Mertz & Davis, Inc.
Manassas, Virginia
FCC Contours
41 dBu F(50,90)
48 dBu F(50,90)
Atlanta
Scale 1:1,500,000
0 20 40 60 km
Chattanooga
East Brainerd
Fairview
Catoosa
Dade
Walker
LaFayette
Whitfield
Dalton
Murray
Gilmer
Fannin
Clay
Towns
Union
Rabun
Oconee
White
Habersham
Toccoa
Stephens
Lumpkin
Gordon
Calhoun
Chattooga
Pickens
Dawson
Banks
Franklin
Hart
Floyd
Rome
Bartow
Cartersville
Cherokee
Forsyth
Gainesville
Jackson
Abbeville
Greenwood
Saluda
Woodstock
Alpharetta
Kennesaw
Roswell
Buford
Duluth
Lawrenceville
Gwinnett
Barrow
Winder
Athens
Clarke
Oglethorpe
McCormick
Edgefield
Lincoln
Wilkes
Oconee
Polk
Paulding
Cobb
Sandy Springs
North Atlanta
Stone Mountain
Snellville
Mableton
Douglasville
Atlanta
DeKalb
Fulton
Walton
Monroe
Haralson
Bremen
Douglas
East Point
Conyers
Rockdale
Covington
Newton
Morgan
Greene
Taliaferro
Columbia
Aiken
Augusta
Martinez
Thomson
McDuffie
Warren
Richmond
Cleburne
Carrollton
Carroll
Forest Park
Riverdale
Clayton
Fayetteville
Peachtree City
Fayette
Henry
Coweta
Randolph
Heard
Butts
Jasper
Putnam
Eatonton
Hancock
Glascock
Spalding
Pike
Meriwether
Troup
La Grange
Barnesville
Monroe
Jones
Milledgeville
Baldwin
Jefferson
Burke
Waynesboro
Sandersville
Washington
Chambers
Lanett
Valley
Thomaston
Upson
Macon
Bibb
Wilkinson
Johnson
Jenkins
Harris
Talbot
Crawford
Twiggs
Warner Robins
Auburn
Lee
Taylor
Fort Valley
Peach
Dublin

Exhibit 41 - Table I

INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

Superstation, Inc.

WTBS-DT Atlanta, Georgia

Facility ID 64033

Ch. 20 1000 kW 310.3 m

DTV Facilities

Stations Considered	City, State Channel	Distance (km)	Baseline Population (1)	Calculated "Before" Service Population (2)	Calculated "After" Service Population (3)	--- Net "New" Interference --- ("2 percent" test) Population (4)	Percentage (5)	Percentage Reduction of Baseline Population ("10 percent" test) (6)
WGCL-DT (Ref)	Atlanta, GA 19	0.1	3,090,000	3,089,968	3,082,791	7,177	0.23	0.2
WGCL-DT (Lic)	Atlanta, GA 19	0.1	---------- Checklist Facility ----------					
WABW-DT (Ref)	Pelham, GA 20	297.2	---------- Construction Permit to Channel 5 (Docket 02-104) ----------					
WYLE-DT (Ref)	Florence, AL 20	328.7	---------- no interference caused by proposal ----------					
WYLE-DT (CP)	Florence, AL 20	326.1	258,000	351,574	351,388	186	0.07	0.0
WPBA-DT (Ref)	Atlanta, GA 21	5.3	2,956,000	2,904,656	2,873,571	31,085	1.05	2.8
WPBA-DT (CP)	Atlanta, GA 21	5.4	---------- Checklist Facility ----------					

Exhibit 41 - Table I

INTERFERENCE ANALYSIS RESULTS SUMMARY

NTSC Facilities

Stations Considered	City, State Channel	Distance (km)	Baseline Population (1)	Calculated "Before" Service Population (2)	Calculated "After" Service Population (3)	--- Net "New" Interference --- ("2 percent" test) Population (4)	Percentage (5)	---Total Interference--- from DTV only ("10 percent" test) Population (7)	Percentage (8)
WTBS(TV) (Lic)	Atlanta, GA 17	5.3	---------- no interference caused by proposal ----------						
WCLP-TV (Lic)	Chatsworth, GA 18	110.3	1,725,254	1,018,352	1,017,807	545	0.03	43,803	2.5
WBXX-TV (Lic)	Crossville, TN 20	255.4	1,390,888	1,217,785	1,211,715	6,070	0.44	18,951	1.36
WCES-TV (Lic)	Wrens, GA 20	200.2	627,801	589,163	579,508	9,655	1.54	30,381	4.9
WCOV-TV (Lic)	Montgomery, AL 20	244.5	369,677	364,398	358,602	5,796	1.57	6,718	1.82
WCOV-TV (CP)	Montgomery, AL 20	265.3	----------CP authorization BPCT-19960726KH expired on 11/05/2002 ----------						
WGXA(TV) (Lic)	Macon, GA 24	138.0	---------- no interference caused by proposal ----------						
WJSP-TV (Lic)	Columbus, GA 28	111.1	871,281	780,469	780,469	0	0.0	52,968	6.1

Exhibit 41 - Table I

INTERFERENCE ANALYSIS RESULTS SUMMARY

Notes:

(1) For DTV stations, greater of NTSC or DTV Service Population, from FCC Table
For NTSC stations, total population within noise-limited contour

(2) Service population after reduction from terrain and interference losses, before consideration of proposal

(3) Service population after reduction from terrain and interference losses, considering proposal

(4) Net change in population receiving interference resulting from proposal, equals (2) minus (3). A negative number indicates a *reduction* in interference.

(5) Proposal's impact in terms of percentage, equals (4)/(1) times 100 percent: not to exceed *de minimis* limit of 2.0 percent

(6) Total interference to DTV stations: equals 100 percent minus [(3)/(1) X 100%]; proposal may not add interference above 10% total. Zero total interference is indicated if (3) is greater than (1).

(7) NTSC station total population subject to interference from DTV only sources (considering proposal)

(8) Proposal's impact to NTSC station in terms of percentage, equals (7)/(1) times 100 percent; proposal may not add interference above 10% total

The determination of stations for consideration and the determination of baseline population and interference percentages were made as described in the Commission's August 10, 1998 Public Notice *"Additional Application Processing Guidelines for Digital Television"*

Exhibit 41 - Table II

CLASS A STATION INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

Superstation, Inc.

WTBS-DT Atlanta, Georgia

Facility ID 64033

Ch. 20 1000 kW 310 m

Stations Considered	City, State Channel	Distance (km)	Baseline Population (1)	Service Population (2)	---- *Unique Interference* ---- *from proposal* Percentage (3)	(4)
WDTA-LP (CP-Mod)	Atlanta, GA 28	5.9	1,181,191	172,566	0	0.0

OET-69 Class A station analysis notes:

(1) Population within 74 dBu service contour

(2) Service population after reduction from terrain and interference losses, before consideration of proposal

(3) Net change in population receiving interference resulting from proposal. A number in parenthesis indicates a *reduction* in interference.

(4) Proposal's impact in terms of percentage, equals (3)/(1) times 100 percent: not to exceed zero when rounded to the nearest whole percent